

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DARVETTE SMITH, NATALIE)
HODOROVYCH, ERIN BOX, and)
BLAKE BREZINSKY, individually and)
on behalf of all others similarly situated,)
Plaintiffs,)
) Judge John Z. Lee
v.)
) Magistrate Judge Jeffrey Cole
FAMILY VIDEO MOVIE CLUB, INC.,)
Defendant.)
Case No. 1:11-cv-01773

**AGREED MOTION TO EXTEND THE DEADLINE
TO FILE A MOTION FOR PRELIMINARY APPROVAL AND RESET STATUS
HEARING DATE**

Plaintiffs, Darvette Smith, Natalie Hodorovych, Erin Box, and Blake Brezinsky (“Plaintiffs”), and Defendant, Family Video Movie Club, Inc. (“Family Video”) (collectively, the “Parties”), by their attorneys and pursuant to the Court’s order dated March 22, 2017, move for entry of an order extending the deadline to file a motion for preliminary approval and continuing the next status hearing, and in support thereof, state as follows:

1. On March 21, 2017, the parties appeared for status before the Court and reported that they were engaged in settlement negotiations.

2. Since the last status hearing, the Parties have continued to engage in settlement discussions and are pleased to report that on April 20, 2017, they reached an agreement in principle on a proposed settlement that would resolve all claims in this matter.

3. The Parties respectfully request 45 days, or until June 5, 2017, to prepare and execute a formal settlement agreement and file a motion for preliminary approval, as well as all related settlement papers.

4. In addition, under the circumstances, the Parties request that the Court continue the status hearing currently scheduled for April 26, 2017 at 9:00 a.m. until the hearing date when the motion for preliminary approval is presented.

WHEREFORE, Plaintiffs, Darvette Smith, Natalie Hodorovych, and Erin Box, and Defendant, Family Video Movie Club, Inc. respectfully request that the Court enter an order (1) extending the deadline to file a motion for preliminary approval until June 5, 2017, and (2) continuing the next status hearing to such a date when the motion for preliminary approval is presented.

Dated: April 21, 2017

Respectfully submitted,

By: /s/ Eric H. Gibbs
One of Plaintiffs' Attorneys

By: /s/ Joel Griswold
One of Defendant's Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that, on April 21, 2017, I caused the foregoing AGREED MOTION TO EXTEND THE DEADLINE TO FILE A MOTION FOR PRELIMINARY APPROVAL AND RESET STATUS HEARING DATE to be served on all counsel of record via CM/ECF filer for the U.S. District Court for the Northern District of Illinois.

/s/ Joel Griswold